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August 14, 2017

Sherrel Henry
Remedial Project Manager
Emergency and Remedial Response Division
US Environmental Protection Agency, Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

RE: Shieldalloy Metallurgical Corporation Superfund Site
Newfield, New Jersey
CERCLA Docket No. 02-2010-2017
OU2 – Remedial Action Work Plan

Dear Ms. Henry:

TRC Environmental Corp. (TRC) has prepared this Operable Unit 2 (OU2) Remedial Action Work Plan (RAWP) for the Shieldalloy Metallurgical Corporation (SMC) Superfund Site (Site), located in Newfield, New Jersey, in accordance with the OU2 Statement of Work (SOW). Per the OU2 SOW, the schedule for submitting the RAWP to EPA is “45 days after EPA Notice of Authorization to Proceed with RA, or EPA approval of the OU2 RD, whichever is later.” The EPA conditionally approved the OU2 RD June 30, 2017, making the RAWP deadline August 14, 2017.

In accordance with the requirements of the OU2 SOW, this RAWP includes a discussion of the following items:

- (a) A proposed Remedial Action (RA) Construction Schedule such as critical path method, Gantt chart, or PERT;
- (b) An updated health and safety plan that covers activities during the RA; and
- (c) Plans for satisfying permitting requirements, including satisfying substantive requirements of permits for site activity.

Proposed RA Construction Schedule

The proposed RA construction schedule, based on currently understood tasks, including integrating radiological (RAD) elements, is included as Figure 1.

Updated Health and Safety Plan

A Health and Safety Plan (HASP), updated to cover activities to be performed during the RA, was included as Appendix F of the conditionally approved RD Report. If necessary, the HASP can be updated following advancement of the RAD elements.

Plans for Satisfying Permitting Requirements

A discussion of TRC's approach to satisfying permitting requirements is provided below and as presented in Section 3.5.1 of the RD Report.

In order to address permit equivalencies in a manner consistent with the project schedule, it was determined, during a pre-application meeting with TRC, USEPA, and NJDEP held on January 23, 2017, that the key permit equivalencies would be submitted concurrently with the Draft Final Design. The following permit equivalencies applications were submitted concurrently with the RD Report and have been approved by the NJDEP:

- General Permit #4 and Restoration Plan Equivalence, as well as the Flood Hazard Area (FHA) individual Permit (as one package) to the Division of Land Use Regulation (DLUR), some of which will be coordinated by NJDEP Office of Dredging and Sediment Technology and NJDEP Flood Hazard Engineering Group.
- Storm Water Discharge Permit Equivalence for Disturbance of Greater than One Acre of Land (New Jersey Pollutant Discharge Elimination System [NJPDES] General Permit 5G3), review of which will be coordinated by NJDEP Flood Hazard Engineering Group.

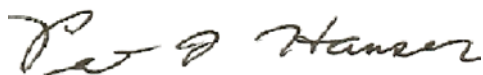
The following permit equivalences will be submitted after the RAD issues have been delineated:

- Soil Erosion and Sediment Control Plan Equivalence (SESCP, Gloucester or Cumberland County District).
- Bureau of Surface Water Permitting Equivalence General Remediation Cleanup (BGR) Permit.
- A general Industrial Treatment Works Approval (TWA) Permit equivalence must follow the issuance of the BGR. The TWA equivalence will be obtained prior to mobilization.

Please feel free to contact me if you have any questions or wish to discuss this matter further.

Regards,

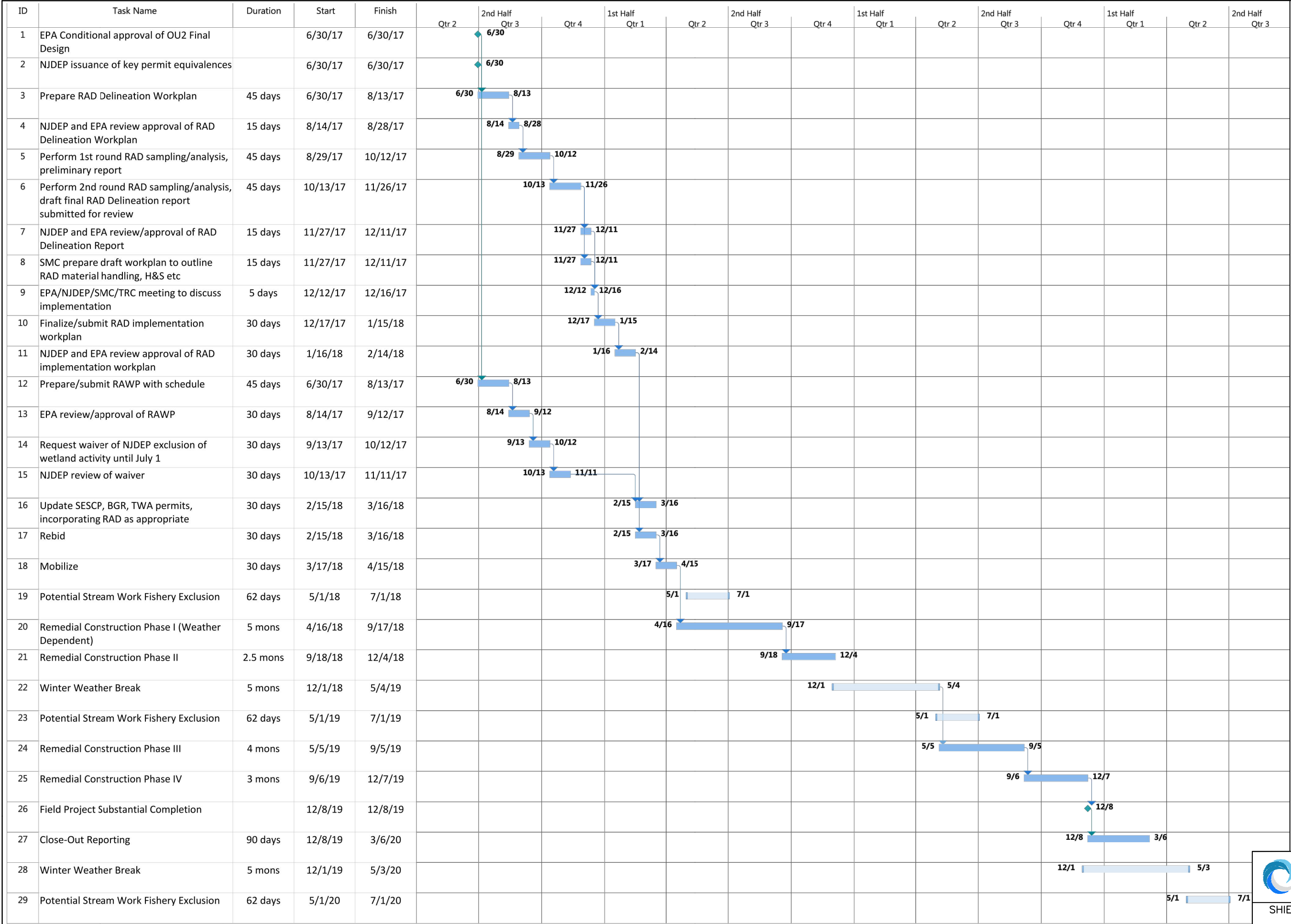
TRC



Patrick J. Hansen
Project Coordinator

cc: David Lewis, SMC
Donna Gaffigan, NJDEP





Note:
Expected durations of OU2 are based on current quantities and approved procedures, and assumption that radiation delineation and handling procedures will be completed in the time frame indicated, and that the results of RAD delineation do not materially alter the work. Should adjustments to procedures affect production, durations could change.